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Attorneys for Defendant Champion Laboratories, Inc.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

SEPHER TORABI d/b/a PROTEC AUTO, on behalf of himself and all others similarly situated,

Plaintiff,

v.

CHAMPION LABORATORIES, INC.; PUROLATOR FILTERS N.A. L.L.C.; HONEYWELL INTERNATIONAL, INC.; WIX FILTRATION CORP; THE DONALDSON COMPANY; BALDWIN FILTERS, INC.; BOSCH USA; MANN + HUMMEL USA, INC.; ARVINMERITOR, INC., and JOHN DOE DEFENDANTS 1-100,

Defendants.

Case No. 08-CV-01345 LAB

CLASS ACTION

JOINT MOTION AND STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT CHAMPION LABORATORIES, INC. TO RESPOND TO THE COMPLAINT

JURY TRIAL DEMANDED

Plaintiff Sepher Torabi d/b/a Protec Auto ("Plaintiff") and Defendant Champion Laboratories, Inc. ("Champion") jointly move the Court for an order extending the time for Champion to respond to the complaint on file in this action until September 18, 2008. Plaintiff and Champion stipulate and agree that good cause for this motion exists as follows:

1. On July 25, 2008, Plaintiff filed the complaint in this action ("Complaint"), which alleges claims under Section 1 of the Sherman Act, 15 U.S.C. § 1, and various state antitrust and consumer protection laws. Plaintiff styled the Complaint as a putative class action.

2. Plaintiff alleges antitrust violations by manufacturers, distributors, and sellers of oil, air, fuel and transmission filters ("Filters"), including but not limited to Champion, Purolator Filters N.A. L.L.C., Bosch U.S.A., Mann + Hummel U.S.A., Inc., ArvinMeritor, Inc., Honeywell International Inc., Wix Filtration Corp LLC, Cummins Filtration Inc., Donaldson Company, Inc., and Baldwin Filters, Inc. (the "Defendants").

3. As of the date of this Joint Motion and Stipulation, at least 50 complaints have been filed in nine different judicial districts (collectively, the "Filters Cases"). All of these complaints also allege federal and/or state law antitrust claims against the Defendants and are styled as putative class actions.

4. Four motions are pending before the Judicial Panel on Multidistrict Litigation ("JPML" or "Panel") to transfer and consolidate all existing and subsequently filed antitrust actions related to the claims alleged in the Complaint to a single district pursuant to 28 U.S.C. § 1407 ("JPML Motions").

5. The Panel heard oral argument on the JPML Motions on July 31, 2008 in San Francisco, California.

4. In light of the multiplicity of complaints on file and the pending motions before the JPML, the Plaintiff and Champion STIPULATE AND AGREE that the time for Champion to answer or otherwise respond to the Complaint in this matter shall be extended to September 18, 2008.

WHEREFORE, Plaintiff and Champion jointly move this Court to grant this joint motion to extend the time for Champion to answer or respond to the Complaint to September 18, 2008. A proposed order is being submitted concurrently herewith.

Dated: August 11, 2008

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Robert S. Huie
Robert S. Huie (237374)

Attorneys for Defendant Champion Laboratories, Inc.

Dated: August 8, 2008

BRAUN LAW GROUP, P.C.

By: /s/ Michael D. Braun
Michael D. Braun (167416)

Attorneys for Plaintiff Sepher Torabi d/b/a Protec Auto

FILER'S ATTESTATION:

Pursuant to General Order No. 45, § X(B) regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from its signatories.

Dated: August 11, 2008

By: /s/ Robert S. Huie
Robert S. Huie (237374)

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

SEPHER TORABI d/b/a PROTEC AUTO, on behalf of himself and all others similarly situated, Plaintiff, v. CHAMPION LABORATORIES, INC.; PUROLATOR FILTERS N.A. L.L.C.; HONEYWELL INTERNATIONAL, INC.; WIX FILTRATION CORP; THE DONALDSON COMPANY; BALDWIN FILTERS, INC.; BOSCH USA; MANN + HUMMEL USA, INC.; ARVINMERITOR, INC., and JOHN DOE DEFENDANTS 1-100, Defendants.	**Case No. 08-CV-01345 LAB** **CLASS ACTION** **CHAMPION LABORATORIES, INC.'S NOTICE OF PARTY WITH FINANCIAL INTEREST** **JURY TRIAL DEMANDED**

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Rule 40.2, defendant Champion Laboratories, Inc., by and through its undersigned counsel, states that United Components, Inc., a privately held corporation, owns 100% of Champion Laboratories' stock. UCI Acquisition Holdings, Inc., a privately held corporation, owns 100% of United Component's stock. UCI Holdco, Inc., a privately held corporation, owns 100% of UCI Acquisition Holdings, Inc.'s stock. Carlyle Partners III, L.P., a limited partnership, holds the majority of UCI Holdco, Inc.'s stock. No publicly held corporation owns 10% or more of Champion Laboratories, Inc.'s stock.

Dated: August 11, 2008

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Robert S. Huie
Robert S. Huie (237374)

Attorneys for Defendant Champion Laboratories, Inc.

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Attorneys for Defendant Champion Laboratories, Inc.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

SEPHER TORABI d/b/a PROTEC AUTO, on behalf of himself and all others similarly situated, Plaintiff, v. CHAMPION LABORATORIES, INC.; PUROLATOR FILTERS N.A. L.L.C.; HONEYWELL INTERNATIONAL, INC.; WIX FILTRATION CORP; THE DONALDSON COMPANY; BALDWIN FILTERS, INC.; BOSCH USA; MANN + HUMMEL USA, INC.; ARVINMERITOR, INC., and JOHN DOE DEFENDANTS 1-100, Defendants.	**Case No. 08-CV-01345 LAB** **CLASS ACTION** **PROOF OF SERVICE** **JURY TRIAL DEMANDED**

I am employed in the County of San Diego, State of California. I am over the age of 18 years and not a party to this action. My business address is Latham & Watkins, San Diego Downtown, 600 West Broadway, Suite 1800, San Diego, California 92101-3375.

On **August 11, 2008**, I served the following document described as:

JOINT MOTION AND STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT CHAMPION LABORATORIES, INC. TO RESPOND TO THE COMPLAINT

CHAMPION LABORATORIES, INC.'S NOTICE OF PARTY WITH FINANCIAL INTEREST

ORDER

by serving a true copy of the above-described document in the following manner:

BY U.S. MAIL

I am familiar with the office practice of Latham & Watkins for collecting and processing documents for mailing with the United States Postal Service. Under that practice, documents are deposited with the Latham & Watkins personnel responsible for depositing documents with the United States Postal Service; such documents are delivered to the United States Postal Service on that same day in the ordinary course of business, with postage thereon fully prepaid. I deposited in Latham & Watkins' interoffice mail a sealed envelope or package containing the above-described document and addressed as set forth below in accordance with the office practice of Latham & Watkins for collecting and processing documents for mailing with the United States Postal Service:

Brian D. Brooks
MURRAY, FRANK & SAILER LLP
275 Madison Avenue, Suite 801
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Tel: 212.682.1818
Fax: 212.682.1892
Attorneys for Plaintiff SEHPHER TOBRABI d/b/a PROTEC AUTO

BY ELECTRONIC FILING

I am familiar with the United States District Court, Southern District of California's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the court. The court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document. Registration as a CM/ECF user constitutes consent to electronic service through the court's transmission facilities. Under said practice, the following CM/ECF users were served:

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Attorneys for Plaintiff SEHPHER TOBRABI d/b/a PROTEC AUTO

I declare that I am employed in the office of a member of the Bar of, or permitted to practice before, this Court at whose direction the service was made and declare under penalty of perjury that the foregoing is true and correct.

Executed on **August 11, 2008**, at San Diego, California.

Becky J. Neidhardt

Becky J. Neidhardt